

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT,
IN AND FOR LAKE COUNTY, FLORIDA**

**WILLIAM HICKEY and
MARY JANE HICKEY,
Plaintiffs**

Case No.: 2012 CA 3271

vs.

**FRED K. PLUMMER, BETTY A.
PLUMMER, KEVIN BLACKLIDGE,
SIMON BRAZIL, UNKNOWN
TENANT(S), REGIONAL ASSET
SERVICING CORPORATION,
a Florida Corporation, and the
UNITED STATES OF AMERICA.
Defendants.**

NOTICE OF FILING

NOTICE IS HEREBY GIVEN that the mortgage and note being foreclosed by Plaintiff was discharged in Bankruptcy, and would further state:

1. Defendants, Fred K. Plummer and Betty A. Plummer filed a Chapter 7 bankruptcy in the Middle District of Florida, case number 6:11-bk-09917-KSJ on June 30, 2011.
2. The property located at 1029 Magnolia St., Clermont, FL 34711 was surrendered in their Chapter 7 bankruptcy (see Exhibit A attached hereto).
3. Defendants did not sign a reaffirmation agreement for subject property.
4. On October 4, 2011, Defendants received a Discharge in their bankruptcy.
5. Defendants were served a Complaint for foreclosure on October 8, 2012 for the subject property.
6. Pursuant to the bankruptcy discharge any judgment entered must be limited to *in rem* relief against the property and not *in personam* relief against the Defendants.

7. The filing of this Notice is only for the convenience of the Court and does not constitute an appearance in this State Court case. The undersigned attorney represents the Defendants only in connection with the Bankruptcy case filed in the U.S. Bankruptcy Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this the 18th day of October, 2012, I electronically filed the foregoing Notice with the Clerk of the Courts by using the ECF system which will send a notice of electronic filing to the following: James L. Homich, Attorney for Plaintiffs, 621 E. Fifth Avenue, Mount Dora, FL 32757 at email address jhomich@earthlink.net. I further certify that I mailed the foregoing document by first-class U.S. Mail to the following non-ECF participants: William Hickey and Mary Jane Hickey, 1741 1741 Stafford Springs Blvd., Mount Dora, FL 32757; and Defendants, Frederick Kelley Plummer and Betty Ann Plummer, 16731 Tequesta Trail, Clermont, FL 34715, this the 18th day of October, 2012.

/s/ JOEL L GROSS
JOEL L. GROSS, Esq.
FBN: 0419796
The Law Office of Joel L. Gross, P.A.
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B8 (Form 8) (12/08)

United States Bankruptcy Court
Middle District of Florida

In re **Frederick Kelley Plummer**
Betty Ann Plummer

Debtor(s)

Case No.

Chapter

7

CHAPTER 7 INDIVIDUAL DEBTOR'S STATEMENT OF INTENTION

PART A - Debts secured by property of the estate. (Part A must be fully completed for **EACH** debt which is secured by property of the estate. Attach additional pages if necessary.)

Property No. 1	
Creditor's Name: Centennial Bank	Describe Property Securing Debt: 600 S. Main Avenue Minneola, FL 34755 SURRENDER
Property will be (check one): <input checked="" type="checkbox"/> Surrendered <input type="checkbox"/> Retained	
If retaining the property, I intend to (check at least one): <input type="checkbox"/> Redeem the property <input type="checkbox"/> Reaffirm the debt <input type="checkbox"/> Other. Explain _____ (for example, avoid lien using 11 U.S.C. § 522(f)).	
Property is (check one): <input type="checkbox"/> Claimed as Exempt <input checked="" type="checkbox"/> Not claimed as exempt	

Property No. 2	
Creditor's Name: Chase	Describe Property Securing Debt: 16731 Tequesta Trail Clermont, FL 34715 HOMESTEAD
Property will be (check one): <input type="checkbox"/> Surrendered <input checked="" type="checkbox"/> Retained	
If retaining the property, I intend to (check at least one): <input type="checkbox"/> Redeem the property <input checked="" type="checkbox"/> Reaffirm the debt <input type="checkbox"/> Other. Explain _____ (for example, avoid lien using 11 U.S.C. § 522(f)).	
Property is (check one): <input type="checkbox"/> Claimed as Exempt <input checked="" type="checkbox"/> Not claimed as exempt	

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Property No. 3	
Creditor's Name: Ford Motor Credit	Describe Property Securing Debt: 2006 Ford F250 110,600 miles VIN #1FTSW21P66ED82111
Property will be (check one): <input type="checkbox"/> Surrendered <input checked="" type="checkbox"/> Retained	
If retaining the property, I intend to (check at least one): <input type="checkbox"/> Redeem the property <input checked="" type="checkbox"/> Reaffirm the debt <input type="checkbox"/> Other. Explain _____ (for example, avoid lien using 11 U.S.C. § 522(f)).	
Property is (check one): <input type="checkbox"/> Claimed as Exempt <input checked="" type="checkbox"/> Not claimed as exempt	

Property No. 4	
Creditor's Name: Wells Fargo/Wachovia	Describe Property Securing Debt: 16731 Tequesta Trail Clermont, FL 34715 HOMESTEAD
Property will be (check one): <input type="checkbox"/> Surrendered <input checked="" type="checkbox"/> Retained	
If retaining the property, I intend to (check at least one): <input type="checkbox"/> Redeem the property <input checked="" type="checkbox"/> Reaffirm the debt <input type="checkbox"/> Other. Explain _____ (for example, avoid lien using 11 U.S.C. § 522(f)).	
Property is (check one): <input type="checkbox"/> Claimed as Exempt <input checked="" type="checkbox"/> Not claimed as exempt	

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Property No. 5	
Creditor's Name: William Hickey	Describe Property Securing Debt: 1029 Magnolia St. Clermont, FL 34711 SURRENDER
Property will be (check one): <input checked="" type="checkbox"/> Surrendered <input type="checkbox"/> Retained	
If retaining the property, I intend to (check at least one): <input type="checkbox"/> Redeem the property <input type="checkbox"/> Reaffirm the debt <input type="checkbox"/> Other. Explain _____ (for example, avoid lien using 11 U.S.C. § 522(f)).	
Property is (check one): <input type="checkbox"/> Claimed as Exempt <input checked="" type="checkbox"/> Not claimed as exempt	

PART B - Personal property subject to unexpired leases. (All three columns of Part B must be completed for each unexpired lease. Attach additional pages if necessary.)

Property No. 1		
Lessor's Name: -NONE-	Describe Leased Property:	Lease will be Assumed pursuant to 11 U.S.C. § 365(p)(2): <input type="checkbox"/> YES <input type="checkbox"/> NO

I declare under penalty of perjury that the above indicates my intention as to any property of my estate securing a debt and/or personal property subject to an unexpired lease.

Date June 30, 2011
 Signature /s/ Frederick Kelley Plummer
 Frederick Kelley Plummer
 Debtor
Date June 30, 2011
 Signature /s/ Betty Ann Plummer
 Betty Ann Plummer
 Joint Debtor